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22 *Attorneys for Plaintiffs/Counterdefendants*

23 UNITED STATES DISTRICT COURT

24 DISTRICT OF NEVADA

25 NEW ENGLAND LIFE INSURANCE
26 COMPANY, METROPOLITAN LIFE
27 INSURANCE COMPANY,

28 Plaintiffs,

vs.

29 JIMMY LEE, an individual, JOHN (a/k/a JACK)
30 EWING, an individual, KARIN METCALF, an
31 individual, WEALTH CONSULTING GROUP,
32 LLC, THE WEALTH CONSULTING GROUP
33 LLC, and KAIZEN CONSULTANTS, LLC,

34 Defendants.

35 Case No. 14 CV 01797(JCM)(NJK)

36 **STIPULATION AND
37 PROPOSED ORDER TO DISMISS
38 WITH PREJUDICE**

1 JIMMY LEE, an individual, WEALTH
2 CONSULTING GROUP, LLC; THE WEALTH
3 CONSULTING GROUP LLC; KAIZEN
4 CONSULTANTS LLC,

5 Counterclaimants,
6 vs.

7 NEW ENGLAND LIFE INSURANCE
8 COMPANY, METROPOLITAN LIFE
9 INSURANCE COMPANY,

10 Counterdefendants.

11 Pursuant to Federal Rule of Civil Procedure 41(a)(1) and Local Rule 7-1,
12 Plaintiffs/Counterdefendants New England Life Insurance Company (“NELICO”), and
13 Metropolitan Life Insurance Company (“MetLife”); Defendants/Counterclaimants Jimmy Lee
14 (“Lee”), Wealth Consulting Group, LLC (“WCG”), The Wealth Consulting Group LLC
15 (“TWCG”), and Kaizen Consultants LLC (“Kaizen”) (collectively, the “Lee Parties”);
16 Defendant/Counterclaimant John (a/k/a Jack) Ewing (“Ewing”); and Defendant/Counterclaimant
17 Karin Metcalf (“Metcalf”), through their respective counsel, hereby stipulate and agree that this
18 matter shall be dismissed in its entirety, with prejudice. Each side to bear its own costs and
19 attorneys’ fees.

20 DATED this 7th day of September, 2016.

21 Proskauer Rose LLP

22 By: s/ Joseph C. O’Keefe

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3 *Attorneys for Plaintiffs/Counterdefendants*
4 *New England Life Insurance Company and*
Metropolitan Life Insurance Company

5
6
7 DATED this 7th day of September, 2016.

8 BAILEY♦KENNEDY

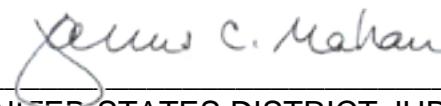
9 By: s/ Joshua M. Dickey
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16 *Attorneys for Defendants/Counterclaimants*
17 *Jimmy Lee; Wealth Consulting Group, LLC;*
18 *The Wealth Consulting Group LLC; and*
19 *Kaizen Consultants LLC*

20 DATED this 7th day of September, 2016.

21 JAMES KWON, LLC

22 By: s/ James W. Kwon
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25 Suite 107
26 Las Vegas, Nevada 89146
27 *Attorneys for Defendants/Counterclaimants*
28 *John aka Jack Ewing and Karin Metcalf*

29 IT IS SO ORDERED September 8, 2016.

30 
31 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d), I hereby certify that on the 7th day of September, 2016, I served a true and correct copy of the foregoing **STIPULATION OF DISMISSAL WITH PREJUDICE OF CLAIMS AS AGAINST LEE DEFENDANTS, EWING, AND METCALF AND ALL COUNTERCLAIMS AS AGAINST PLAINTIFFS/COUNTERDEFENDANTS** by ECF on all counsel of record.

DATED this 7th day of September, 2016.

PROSKAUER ROSE, LLP

/s/ Joseph C. O'Keefe

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